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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JACQUELINE RAMOS and EDWIN JOHNSON,
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

WALMART INC.,

Defendant.

Case No. 21-13827-BRM-AME

Judge Brian R. Martinotti
Magistrate Judge André M. Espinosa

**NOTICE OF PLAINTIFFS' CROSS-MOTION FOR
PARTIAL JUDGMENT ON THE PLEADINGS**

PLEASE TAKE NOTICE that upon the Brief in Support of Plaintiffs' Cross-Motion for Partial Judgment on the Pleadings, Plaintiffs will move this Court on October 3, 2022, or as soon thereafter as counsel can be heard, for a judgment establishing that a six-year statute of

limitations period applies to claims under the Pennsylvania Criminal History Information Act, pursuant to 42 Pa.C.S.A. § 5527(b).

Dated: August 30, 2022

Respectfully submitted,

/s/ Gregory Chiarello

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CERTIFICATE OF SERVICE

I, Gregory Chiarello, an attorney, hereby certify that on August 30, 2022, I caused to be served a copy of the foregoing Notice of Plaintiffs' Cross-Motion for Partial Judgment on the Pleadings in the above entitled action using the CM/ECF system, which sent notification of this filing to all counsel of record.

/s/ Gregory Chiarello
Gregory Chiarello